

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| NEAL MILLER and DONNA MILLER, Individually and as Administrators of the Estate of RYAN MILLER, a Minor, Deceased | : : : : : : : | CIVIL ACTION NO. 20-cv-06301-MMB |
| v. | | |
| POLICE OFFICER JOSEPH WOLK | | |

**PLAINTIFFS' RESPONSE TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

Plaintiffs Neal Miller and Donna Miller, by and through their undersigned counsel, hereby file their Opposition to Defendant's Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56. In support of their opposition, Plaintiffs incorporate the attached Memorandum of Law as well as their response to Defendant's Statement of Material Facts as well as their own Counterstatement of Material Facts. Plaintiff respectfully requests that Defendant's Motion for Summary Judgment be denied with prejudice.

Respectfully submitted,

FLAGER & ASSOCIATES, P.C.

By: /s/ Michael S. Levin
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